

### REMARKS

Independent claim 1 is pending in the application. Independent 1 has been canceled and claims 17 – 43 have been newly added, of which claims 17, 31 and 33 are independent; as a result, claims 17 – 43 are now pending in this application. No new matter has been added by way of these newly added claims. Favorable reconsideration of the action mailed on June 14, 2007 is respectfully requested in view of the foregoing amendments and following comments of the Applicants.

Claim 1 was rejected under 35 U.S.C. §103(a) as being unpatentable over Langseth et al. (U.S. Patent No. 6,694,316) in view of one of ordinary skill in the art.

Independent claim 1 has been canceled, as such Applicants submit the rejection is rendered moot.

In regards to newly added independent claim 17, a computer implemented method is described for managing and distributing offers that includes producing a marketing campaign that has offers specified by offer data processing rules from which one or more of the offers are identified for targeting specific individuals. The method also includes prioritizing offers for an individual to determine which offer should be sent to the individual from multiple offers associated with the individual. A prioritized offer is selected from the prioritized offers for presenting to the individual associated with those prioritized offers. The method also includes presenting the selected prioritized offer to the associated individual over one of a plurality of delivery channels associated with the prioritized offer.

Langseth is not understood to disclose or suggest “producing a marketing campaign... for targeting specific individuals [and] prioritizing offers for an individual to determine which offer should be sent to the individual”, as required by newly added independent claim 17. Rather, Langseth describes a system in which a subscriber may choose from channels of content as he or she desires. In this regard, Langseth reads:

**“This invention provides a system and method for providing a plurality of channels of personal intelligence content to enable subscribers to more specifically choose the content they desire to receives. The database system may then provide a plurality of ‘channels’**

wherein each channel may comprise information and transactional data about a particular field of interest, such as business, weather, sports, news, investments, traffic, radio content, television content, and others. Subscribers may then sign up to receive output from one or more services from one or more of the channels of information. A service should be understood to be formatted content that is sent to certain subscribers at a certain frequency or based on the occurrence of a predetermined event, such as an update to a database. For example, a service for a finance channel may be called "Market Update" that sends an email to subscribers every day at 5 p.m. with a summary of the market results for the day. That same service may be scheduled to run periodically throughout the day when new market information is loaded into the investor channel database. These are only two examples of the many types of services that may be processed by the system of the present invention." (Col. 3, Lines 13-33)

Thus, Langseth describes a system for subscribers to sign up for receiving different types of services over one or more information channels. Langseth is not understood to disclose or suggest prioritizing offers for an individual to determine which offer should be sent to the individual. Langseth appears silent in regards to prioritizing offers. Furthermore, Langseth is not understood to disclose or suggest "selecting a prioritized offer from prioritized offers for presenting to the individual associated with those prioritized offers." Accordingly, Applicants respectfully assert that the teachings of Langseth fail to disclose each and every element of newly added independent claim 17.

For at least these reasons, independent claim 17 is believed to be patentable over the Langseth. Newly added independent claims 31 and 33 include limitations that are similar to those described above with respect to claim 17. These claims are also believed to be allowable for at least the same reasons noted above.

Each of the pending dependent claims are also believed to define patentable features of the invention. Each dependent claim partakes of the novelty of its corresponding independent claim and, as such, has not been addressed specifically herein.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this

paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

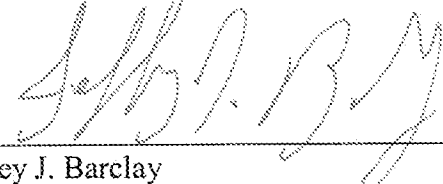
In view of the foregoing amendments and remarks, Applicants respectfully submit that the application is in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at the address shown below. All telephone calls should be directed to the undersigned at 617-368-2191.

Please apply all charges or credits to Deposit Account No. 06-1050, referencing Attorney Docket No. 10235-048001.

Respectfully submitted,

Date: 14 August 2007

  
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